

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

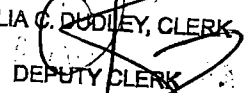
## UNITED STATES DISTRICT COURT

for the

Western District of Virginia

Civil Division

MAY 09 2019

JULIA C. DUDLEY, CLERK  
BY:   
DEPUTY CLERKTerry C. Bradley  
Plaintiff Pro Se

Case No.

7:19CV359  
(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Sgt. Snidow  
Officer Miano  
Virginia Tech. Police DepartmentJury Trial: (check one) ☒ Yes ☐ No

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Terry C. Bradley		
Address	3724 Sapphire Rd. Unit 1		
	Fayetteville	NC	2303
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Cumberland		
Telephone Number	910-922-260		
E-Mail Address	tcbradley7@gmail.com		

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

## Defendant No. 1

Name	L.L. Snidow		
Job or Title <i>(if known)</i>	Sgt. Virginia Tech. Police Officer		
Address	330 Sterrett Drive		
	Blacksburg	VA	24061
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Montgomery		
Telephone Number			
E-Mail Address <i>(if known)</i>			

☐ Individual capacity ☒ Official capacity

## Defendant No. 2

Name	F.M. Miano		
Job or Title <i>(if known)</i>	Officer Virginia Tech. Police Officer		
Address	330 Sterrett Drive		
	Blacksburg	VA	24061
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address <i>(if known)</i>			

☐ Individual capacity ☒ Official capacity

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## Defendant No. 3

Name \_\_\_\_\_

Job or Title (if known) \_\_\_\_\_

Address \_\_\_\_\_

City

State

Zip Code

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (if known) \_\_\_\_\_

☐

Individual capacity

☐

Official capacity

## Defendant No. 4

Name \_\_\_\_\_

Job or Title (if known) \_\_\_\_\_

Address \_\_\_\_\_

City

State

Zip Code

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (if known) \_\_\_\_\_

☐

Individual capacity

☐

Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

CIVIL RIGHTS: EQUAL PROTECTION UNDER THE LAW FIFTH AND FOURTEENTH AMENDMENT OF THE U.S.  
CONSTITUTION: VIOLATION OF DUE PROCESS.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

NOT APPLICABLE

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- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
- DEFENDANT(S) 1 AND 2 ACTING WITHIN THEIR OFFICAL CAPACITY; UNDER COLOR OF COLOR; WITHOUT PROPER JURISDICTION, INTHE EMPLOYMENT OF THE THE VIRGINIA TECH POLICE DEPARTMENT. USED AN ALTER DOCUMENT; REPRESENTING SUCH AS A VALID WARRANT FOR ARREST. EXECUTED THE ARREST OF THE PLAINTIFF.

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

MONTGOMERY COUNTY COURTHOUSE

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- B. What date and approximate time did the events giving rise to your claim(s) occur?

10/26/01

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- C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

THE AFOREMENTIONED OFFICERS OF THE VIRGINIA TECH POLICE DEPARTMENT, ACTING UPON AN ALLEGED INCIDENT REPORT LODGED BY A REPRESENTATIVE OF THE VA. TECH UNIVERSITY BOOKSTORE, ALLEDGEDLY OBTAINED A VALID WARRANT TO ARREST THE PLAINTIFF. NO VALID ARREST WARRANT WAS OBTAINED. OFFICERS EXECUTED AN ARREST OF THE PLAINTIFF BASED ON FALSIFIED DOCUMENTATION. SUBSEQUENT INVESTIGATIVION VIA VARIOUS LAW ENFORCEMENT AGENCIES BOTH LOCAL AND FEDERAL CONCLUSIVELY SHOW NO VALID ARREST ON RECORD.

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**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

NONE SUSTAINED

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**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

PLAINTIFF SEEKS MONETARY DAMAGES IN THE 61,000.000.00 U.S. DOLLARS; 30,000.000.00 COMPENSATORY DAMAGES  
31,000.000.00 PUNITVE DAMAGES.

IMPROPER ACTIONS TAKEN BY THE DEFENDANTS, WITHOUT LEGAL STANDING CAUSED THE PLAINTIFF UNKNOWN LIFELONG IREPAIRABLE DAMAGE. FACILITATING A QUESTIONABLE ALLEGED CHARGE OF A CRIME, AS WELL A QUESTIONABLE ALLEGED CONVICTION.

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

4/30/19

Signature of Plaintiff

Terry C Bradley

Printed Name of Plaintiff

TERRY C. BRADLEY

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address